

EXHIBIT C

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 - - - - -x

5 E. JEAN CARROLL,

6 Plaintiff,

7 -against-

8 DONALD J. TRUMP, in his personal capacity,
Defendant.

9
10 - - - - -x

11
12 *** CONFIDENTIAL ***

13
14 Remote deposition of CAROL MARTIN, taken
15 pursuant to Notice, was held via videoconference,
16 commencing October 18, 2022, at 10:01 a.m., on the
17 above date, before Amanda McCredo, a Court Reporter
18 and Notary Public in the State of New York.
19
20
21
22
23
24
25

1 C. Martin - Confidential

2 the -- I'm sorry, withdrawn.

3 So the first time you met with Ms. Birnbach
4 and Ms. Carroll together was at Carmines, correct?

5 MR. BIALE: Objection to form.

6 MS. CROWLEY: Objection.

7 BY MR. SWIFT:

8 Q Ms. Martin?

9 MR. BIALE: I just think that misstates her
10 answer. She said she can specify two times.
11 She didn't say that was the first time she met
12 her.

13 BY MR. SWIFT:

14 Q Do you know where the first time that you
15 met with Ms. Carroll and Ms. Birnbach was?

16 MR. BIALE: You're asking about the first
17 time that they ever met together?

18 MR. SWIFT: Yes.

19 A I'm not sure. I can't recall that.

20 BY MR. SWIFT:

21 Q When you were together with them taping the
22 podcast, do you recall when that was?

23 A That was in June of 2019. It was around
24 the time that the book was published. It was for
25 The New York Times.

1 C. Martin - Confidential

2 Q This was at Lisa's apartment, you said?

3 A Correct, yes.

4 Q What was discussed during that podcast?

5 Was it just about the book or were there any other
6 discussions?

7 MR. BIALE: Objection to form.

8 You can answer.

9 A It was about the book and surrounding Me
10 Too issues, if I can say that. Cultural issues.

11 MR. SWIFT: I have nothing further.

12 Thank you, Ms. Martin.

13 MS. CROWLEY: I just have a few questions,
14 Ms. Martin.

15 EXAMINATION BY

16 MS. CROWLEY:

17 Q I'm Shawn Crowley. It's nice to meet you.

18 A It's hard to hear you.

19 Q Better?

20 A Yes.

21 Q So Mr. Swift asked you, I believe, for your
22 general opinion of Mr. Trump.

23 Do you recall that?

24 A Yes.

25 Q And you testified, I believe, that you were